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Federal Communications Commission
Office of the Secretary

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

CC 92-137

RM 7859

In the Matter of	)
	)
Amendment of Section 22.521(b) of the Commission's Rules to Include Schaller, Iowa in the Table of Assignments for Air-Ground Stations in the Public Land Mobile Service	)

To: The Commission

PETITION FOR RULEMAKING

Schaller Telephone Company ("STC"), the provider of local exchange telephone service and improved mobile telephone service ("IMTS") in the Schaller, Iowa area, by its attorneys and pursuant to Rule Section 1.401, hereby petitions the Commission to institute a rule making proceeding to amend the table of assignments for air-ground stations in the Public Land Mobile Service (Rule Section 22.521(b)) to allocate air-ground Channel 3 (454.850 MHz) to Schaller, Iowa. In support of this request, STC submits the following:

I. Introduction

1. In 1969, the Commission established the present 450 MHz band Air-Ground Radiotelephone Service, which is interconnected with the public switched telephone network. Under Rule Section 22.521(a), 12 frequency pairs were allocated for the purpose of providing communications

services to airborne mobile stations from ground stations spread across the country. Rule Section 22.521(b), which allocated these channels to specific geographic locations, requires that any base station be located within 25 miles of the location specified.

2. Schaller, Iowa is not among the locations listed in Section 22.521(b), nor is it within 25 miles of any location specified in the table of channel assignments. As a result, local air-ground service to the general-aviation community is not presently available in this area. Yet, as set forth below, STC has identified a need for such service and has determined that the service can be provided on an interference-free basis, consistent with the Commission's regulatory scheme established in 1969.

II. The Need for Service

3. Schaller, Iowa is located in the western part of the state. It is situated along the primary flight route between Fort Dodge and Sioux City, Iowa, two "hub" cities with significant commercial activity and a combined population of well over 100,000. Based upon a survey conducted by the Iowa Department of Transportation, approximately 9,000 general aviation flights either originated or terminated in the Schaller area at the Storm Lake Municipal Airport during calendar year 1989. Thus, it

is clear that Schaller, Iowa is a major center for general aviation air traffic. STC has conducted an informal survey among general aviation interests in and around the Schaller area and has determined that there is significant interest in a local air-ground communications service. The results of this survey are shown in Exhibit A, attached hereto.

4. Notwithstanding the clear need for a local air-ground service, there are no authorized air-ground stations within 90 miles of STC's proposed site in Schaller. And due to limited capacity and costly toll charges, the existing air-ground stations are unable to provide air-ground service to the Schaller area in an efficient, cost-effective manner. In order to cure this situation, STC proposes that Rule Section 22.521(b) be amended to add the following:

Location	Channel
Iowa	
Schaller	3

This amendment would permit, after proper authorization, the operation of an air-ground station on the working frequency of 454.850 MHz (Channel 3) and 454.675 MHz (the nationwide signalling channel) within a 25-mile radius of Schaller, Iowa. STC has selected Channel 3 for the proposed assignment to afford maximum co-channel separation from all other air-ground stations allocated by Section 22.521(b). As demonstrated by the results of a frequency search using the current FCC Staff Study List (Exhibit B, hereto), there

are no air-ground stations on Channel 3 within a 500-mile radius of STC's proposed site in Schaller. The nearest co-channel facility is located 502 miles away in Oklahoma City, Oklahoma and the co-channel separation is more than sufficient to protect the Oklahoma City co-channel facility from harmful interference, consistent with the Commission's regulatory scheme for assigning air-ground channels. See Report and Order, 50 Fed. Reg. 23125 (May 31, 1985) (wherein the Commission allocated Channel 4 to Mobile, Alabama even though it was only 498 miles from the nearest co-channel facility in Charleston, South Carolina); Report and Order, 50 Fed. Reg. 13332 (April 4, 1985) (Channel 11 allocated to Austin, Texas even though it was located 460 miles from the nearest co-channel facility in New Orleans, Louisiana).

5. In view of the foregoing, STC submits that revision of the Commission's Rules to allocate spectrum for

a 454 MHz air-ground facility at Schaller, Iowa would serve the public interest, convenience and necessity. Accordingly, STC respectfully petitions the Commission to amend its rules, as herein requested.

Respectfully submitted,

SCHALLER TELEPHONE COMPANY

By: Harold Mordkofsky

Richard D. Rubino
Its Attorneys

Blooston, Mordkofsky, Jackson
& Dickens
2120 L Street, N.W.
Washington, D.C. 20037

Tel. (202) 659-0830

Dated: October 18, 1991

EXHIBIT A

STC has conducted an informal survey of general aviation interests in and around the Schaller, Iowa area. The questions raised by the survey were whether there was the need for an air-ground radiotelephone service in the general area and whether the party surveyed would use the service if it were available. The respondents to STC's survey included two hospitals and other medical facilities, a general aviation flying service, and various commercial interests.

The respondents noted that communications between general aviation aircraft and land-based points are poor throughout the area and that STC's proposed air-ground service would significantly improve the reliability of air-ground communications. The medical facilities, which are responsible for flying emergency medical MEDIVAC missions as well as transport of medical personnel between facilities, stated that communications with land-based personnel are either very limited or non-existent and that an air-ground communications service would greatly enhance personnel safety. The flying service and the commercial users support STC's proposed operation because it would provide the Schaller area with a reliable, cost effective air-ground communications service which covers a larger service area than anything currently available.

F R E Q U E N C Y S E A R C H R E S U L T S

FCC Staff Study List as of: August 28, 1991

Search Frequencies: Air-Gnd

Search Area #1: Schaller (Schll)
500 mile radius of 42-28-30 N.Lat 95-16-36 W.Long

********** Summary of Results **********

Frequency	Page No.	Number of Records	Closest Record Schll
454.675		25	89.7
454.700		1	89.7
454.725		2	313.0
454.750		11	287.3
454.775		1	237.9
454.800		2	313.0
454.825		4	359.7
454.850			None
454.875		2	285.5
454.900		2	237.9
454.925		4	359.7
454.950		5	278.8
454.975		5	150.2
Totals		64	89.7

F R E Q U E N C Y S E A R C H R E S U L T S

FCC Staff Study List as of: August 28, 1991

Search Frequencies: 454.850 MHz

Search Area #1: Schaller (Schll)
600 mile radius of 42-28-30 N.Lat 95-16-36 W.Long

Longitude	Latitude	State	CallSign	Status	Grant	PN/ExpDt	Distance & Bearing
Applicant/Licensee					File Number		Schll
********** 454.850 MHz **********							
97.29.34	35.24.02	OK	KUC859	AUTH	12/11/90	09/01/99	502.3
MOBILE TELECOMMUNICATION TECHNOLOGIES					30865-CG-R-(01)-89		193.8D
104.47.01	47.05.44	MT	KPD894	PEND		02/24/82	565.4
WYMO COMMUNICATIONS, COM PAK					22278-CG-P-(01)-82		304.2D

********** End of 454.850 MHz **********

2 matching records within the requested search area

Summary of search results-- Search: Schll
Closest matching record: 502.3
Number of matching records: 2

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